

IN THE UNITED STATES COURT OF APPEALS  
FOR THE EIGHTH CIRCUIT

PENGUIN RANDOM HOUSE  
LLC, *et al.*,

Plaintiffs–Appellees,

v.

JOHN ROBBINS in his official  
capacity as President of the Iowa  
State Board of Educations, *et al.*,

Defendants–Appellants.

Case No. 25-1819

APPELLANTS’ DESIGNATION  
OF APPENDIX METHOD &  
STATEMENT OF ISSUES

John Robbins, McKenzie Snow, and Chad Janzen (“State Defendants”), submit the following designation and statement of issues under the Federal Rules of Appellate Procedure. This appeal follows from Case No. 4:23-cv-00478-SHL-SBJ (S.D. Iowa).

**I. Designation.**

Defendants and Plaintiffs have conferred and agreed to the following joint designation of the record for the appendix, under Eighth Circuit Rule 30A:

*Penguin Random House v. Robbins*

- R. Doc. 34-10, Exhibit I to Plaintiffs’ Brief ISO Motion for Preliminary Injunction;
- R. Doc. 88, Second Amended Complaint and included exhibits;
- R. Doc. 94, Plaintiffs’ Motion for Renewed Preliminary Injunction

- R. Doc. 102, State Defendants' Response to Plaintiffs' Motion for Renewed Preliminary Injunction;
- R. Doc. 104, Plaintiffs' Corrected Brief ISO Motion for Renewed Preliminary Injunction;
- R. Docs. 104-1 to 104-17, Exhibits A–K to Plaintiffs' Corrected Brief ISO Motion for Renewed Preliminary Injunction;
- R. Doc. 107, Plaintiffs' Reply ISO Motion for Renewed Preliminary Injunction;
- R.Doc. 112, Transcript of Proceedings;
- R. Doc. 113, Court's Order Granting Renewed Preliminary Injunction.

## **II. Statement of Issues.**

Defendants intend to present the following issue on appeal:

1. Whether the district court abused its discretion or otherwise erred when it imposed a preliminary injunction against Iowa Senate File 496.

Respectfully submitted,

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Eric Wessan  
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/s/ Patrick Valencia  
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## CERTIFICATE OF SERVICE

I certify that the foregoing was filed with the Clerk using the appellate CM/ECF system on May 5, 2025. All counsel of record are registered CM/ECF users, and service will be accomplished by the CM/ECF system.

May 5, 2025

/s/ Patrick C. Valencia

PATRICK C. VALENCIA

*Deputy Solicitor General*

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